

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TIMOTHY P. O'DONNELL

No.

Violations: Title 18, United States Code,
Section 844(e)

COUNT ONE

The SPECIAL FEBRUARY 2011-2 GRAND JURY charges:

On or about March 18, 2011, at Chicago, in the Northern District of Illinois, Eastern
Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and
maliciously conveyed false information knowing the same to be false, to Individual A in
Nashville, Tennessee, concerning an alleged attempt being made, and to be made, to kill,
injure, and intimidate individuals and unlawfully to damage and destroy buildings and other
real and personal property, namely, schools, churches, hospitals, financial institutions, and
government buildings located throughout the United States, by means of an explosive;

In violation of Title 18, United States Code, Section 844(e).

COUNT TWO

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 18, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to Individual B in Miami, Florida, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

In violation of Title 18, United States Code, Section 844(e).

COUNT THREE

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 18, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to School A in Villanova, Pennsylvania, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

In violation of Title 18, United States Code, Section 844(e).

COUNT FOUR

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 19, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to School B in Boise, Idaho, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

In violation of Title 18, United States Code, Section 844(e).

COUNT FIVE

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 19, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to the Dubuque Fire Department in Dubuque, Iowa, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

In violation of Title 18, United States Code, Section 844(e).

COUNT SIX

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 19, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to the Ames Police Department in Ames, Iowa, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

In violation of Title 18, United States Code, Section 844(e).

COUNT SEVEN

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 19, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to Business A in Boise, Idaho, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

In violation of Title 18, United States Code, Section 844(e).

COUNT EIGHT

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 22, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to Business B in Chicago, Illinois, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

In violation of Title 18, United States Code, Section 844(e).

COUNT NINE

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 22, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to Business C in Chicago, Illinois, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

In violation of Title 18, United States Code, Section 844(e).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY